

REMARKS/DISCUSSION OF ISSUES

Claims 2-12 and 14-20 are pending in the application.

The renumbering of the claims in the FINAL Office Action dated 4 October 2007 is acknowledged. The undersigned attorney apologizes for the typographical error in the previous Office Action response, and recognizes the correct numbering as indicated by the Examiner and reflected in the Listing of the Claims included in this Response.

Reexamination and reconsideration are respectfully requested in view of the following Remarks.

35 U.S.C. § 103

The Office Action rejects: claims 2-7, 11, 12, and 14-17 under 35 U.S.C. § 103 over Grouev et al. U.S. Patent 6,333,605 ("Grouev") in view of Morgan et al. U.S. Patent Publication 2002/0171378 ("Morgan"); claims 5 and 15 under 35 U.S.C. § 103 over Grouev in view of Morgan and further in view of Denes U.S. Patent 7,123,140 ("Denes"); claims 8-9 and 18-19 under 35 U.S.C. § 103 over Grouev in view of Morgan and further in view of Ben-Ze'ev U.S. Patent 6,791,467 ("Ben-Ze'ev"); claims 10 and 20 under 35 U.S.C. § 103 over Grouev in view of Morgan and further in view of Hou U.S. Patent Publication 2002/026035 ("Hou").

Applicants respectfully traverse these rejections and submit that claims 2-12 and 14-20 are all patentable over the cited art for at least the following reasons.

Claims 2-10

Among other things, the methods of claims 2-10 all include operations of three elements: (A) a group of lighting units; (B) a control master; and (C) a remote control.

The Office Action cites: (A) Grouev's ballasts 10 and associated lamp as corresponding to the group of lighting units; (B) Grouev's wall-mounted controller as corresponding to the control master; and (C) Grouev's handheld infra-red transmitter as corresponding to the remote control.

Among the features recited in various ones of the claims 2-10: (1) the control master and the lighting units all communicate via commonly-received wireless transmissions; (2) associating the lighting units with respective control elements of the remote control; (3) each lighting unit includes an adaptable device which selectively operates as either a control master device or a slave device; and (4) the remote control selects one of the adaptable devices to operate as the control master for the group of lighting units.

Applicants respectfully submit that no combination of Grouev and Morgan would ever produce these features.

As to feature (1), neither Grouev nor Morgan discloses that the control master and the lighting units all communicate via commonly-received wireless transmissions. Indeed, the Office Action does not even bother to try to cite anything in Grouev or Morgan that discloses that a control master and the lighting units all communicate via commonly-received wireless transmissions.

As to feature (2) Grouev does not disclose that the handheld infra-red transmitter includes any control elements, or that any lighting units are associated with any such control elements. No such control elements are mentioned in the cited text at COL, 5, lines 42-43, nor is there any mention in the text of associating any lighting units with any such control elements.

As to feature (3), Morgan discloses an arrangement "*where light sources . . . can act as a master to control one or more other slave light sources.*" However, Morgan does not disclose that the light sources include **an adaptable device** which **selectively operates as either** a control master device or a slave device. Nor is any such feature "inherent" in Morgan. Morgan never discloses that when a light source is not acting as a master, it acts a slave. Morgan merely teaches that ONE device may be a master, and the OTHER devices may be slaves. Morgan never teaches that any **one** single device selectively could be configured to be **either** a master or a slave. Without any such teaching or suggestion that any one, single device

selectively could be either a master or a slave, then no adaptable device could possibly be “inherent” in Morgan.

As to feature (4), the Office Actions states that Morgan discloses that lighting devices are controlled using “a remote controller (remote interface 56)” and one light source could act as a master to control other light sources.

So what? That is not what is recited in claim 3. Claim 3 recites that the remote control selects one of the adaptable devices to operate as the control master for the group of lighting units. Morgan does not disclose any adaptable device. Morgan also does not disclose that “remote interface 56” selects an adaptable device to operate as the control master for the group of lighting units.

Also, claim 3 very clearly does not recite any “ranges” – optimum, workable, or otherwise. Claim 3 recites a specific feature that is clearly not disclosed by any of the cited references or any combination thereof, and could only be found through impermissible hindsight reconstruction using Applicants’ own teachings.

Applicants respectfully request that the Examiner reconsider the rejection of claim 3.

Accordingly, for at least these reasons, Applicants respectfully submit that claims 2-10 are all patentable over the cited prior art.

Claims 11-12 and 14-20

Among the features recited in various ones of the claims 11-12 and 14-20: (1) using a remote control to select one of the lighting unit to a control master for the system; (2) associating the lighting units with respective control elements of the remote control; (3) the remote control transmits to the control master a signal identifying the unique ID code for each lighting unit AND the control element with which it has been associated.

Applicants respectfully submit that no combination of Grouev and Morgan would ever produce these features.

As to feature (1), the Office Actions states that Morgan discloses that lighting devices are controlled using “a *remote controller (remote interface 56)*” and one light source could act as a master to control other light sources.

So what? That is not what is recited in claim 11. Claim 11 recites that the remote control selects one of the adaptable devices to operate as the control master for the group of lighting units. Morgan does not disclose any adaptable device. Morgan also does not disclose that “remote interface 56” selects an adaptable device to operate as the control master for the group of lighting units.

Also, claim 11 very clearly does not recite any “ranges” – optimum, workable, or otherwise. Claim 11 recites a specific feature that is clearly not disclosed by any of the cited references or any combination thereof, and could only be found through impermissible hindsight reconstruction using Applicants’ own teachings.

Applicants respectfully request that the Examiner reconsider this rejection of claim 11.

As to feature (2) Grouev does not disclose that the handheld infra-red transmitter includes any control elements, or that any lighting units are associated with any such control elements. No such control elements are mentioned in the cited text at COL, 5, lines 42-43, nor is there any mention in the text of associating any lighting units with any such control elements.

As to feature (3), Applicants respectfully submit that the cited text in Grouev at col. 5, lines 58-61 does not disclose that the remote control transmits to the control master a signal identifying the unique ID code for each lighting unit and the control element (of the remote control) with which it has been associated.

Accordingly, for at least these reasons, Applicants respectfully submit that claims 11-12 and 14-20 are all patentable over the cited prior art.

CONCLUSION

In view of the foregoing explanations, Applicants respectfully requests that the Examiner reconsider and reexamine the present application, allow claims 1-20 and

pass the application to issue. In the event that there are any outstanding matters remaining in the present application, the Examiner is invited to contact Kenneth D. Springer (Reg. No. 39,843) at (571) 283.0720 to discuss these matters.

Respectfully submitted,

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